

JUDGE PATTERSON

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

- - - - -X

UNITED STATES OF AMERICA

: SEALED
: INDICTMENT

- v. -

10 Cr.

OMAR GONZALEZ,
a/k/a "O,"

NELSON VELEZ,
a/k/a "Nell,"

JUAN CAMACHO,
a/k/a "Pito,"

GERALDO MARTINEZ,
a/k/a "Macho,"

DENISE ALAMO,
NIVIA ALAMO,
a/k/a "Nena,"

JIMMY ALAMO,
a/k/a "Skinny,"

RICKY BELL,
RAYMOND LOPEZ,
a/k/a "Ray,"

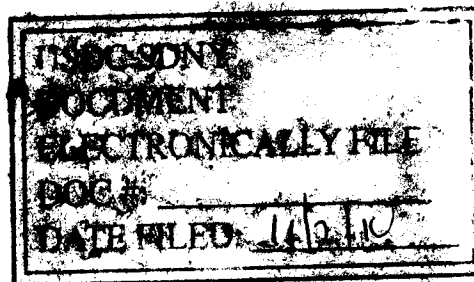
ALEX AMANTE,
JOSE RODRIGUEZ,
a/k/a "Joey,"

LAWRENCE SIMMONS,
a/k/a "Black," and

MANUEL ROSA,
a/k/a "Manny,"

Defendants.

- - - - -X



10 CRIM 1060

COUNT ONE

(Crack Cocaine and Heroin Conspiracy)

The Grand Jury charges:

1. From at least in or about March 2010, up to and including at least in or about October 2010, in the Southern District of New York and elsewhere, OMAR GONZALEZ, a/k/a "O," NELSON VELEZ, a/k/a "Nell," JUAN CAMACHO, a/k/a "Pito," a/k/a

"Papito Camacho," GERALDO MARTINEZ, a/k/a "Macho," DENISE ALAMO, NIVIA ALAMO, a/k/a "Nena," JIMMY ALAMO, a/k/a "Skinny," RICKY BELL, RAYMOND LOPEZ, a/k/a "Ray," ALEX AMANTE, JOSE RODRIGUEZ, a/k/a "Joey," LAWRENCE SIMMONS, a/k/a "Black," and MANUEL ROSA, a/k/a "Manny," the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that OMAR GONZALEZ, a/k/a "O," NELSON VELEZ, a/k/a "Nell," JUAN CAMACHO, a/k/a "Pito," a/k/a "Papito Camacho," GERALDO MARTINEZ, a/k/a "Macho," DENISE ALAMO, NIVIA ALAMO, a/k/a "Nena," JIMMY ALAMO, a/k/a "Skinny," RICKY BELL, RAYMOND LOPEZ, a/k/a "Ray," ALEX AMANTE, JOSE RODRIGUEZ, a/k/a "Joey," LAWRENCE SIMMONS, a/k/a "Black," and MANUEL ROSA, a/k/a "Manny," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were: (i) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) 100 grams and more of mixtures and substances containing a detectable amount of heroin,

in violation of Title 21, United States Code, Section 841(b) (1) (B) .

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 22, 2010, in the vicinity of 621 Manida Street, Bronx, New York, NELSON VELEZ, a/k/a "Nell," and DENISE ALAMO, the defendants, sold approximately 20 glassine bags of heroin to an undercover officer working for the New York City Police Department ("NYPD") for approximately \$150.

b. On or about April 1, 2010, in the vicinity of 621 Manida Street, Bronx, New York, JUAN CAMACHO, a/k/a "Pito," a/k/a "Papito Camacho," the defendant, sold approximately 12 bags of "crack" cocaine to an NYPD undercover officer for approximately \$100.

c. On or about May 7, 2010, in the vicinity of Coster Street and Randall Avenue, Bronx, New York, NELSON VELEZ, a/k/a "Nell," the defendant, sold approximately 20 glassine bags of heroin to an NYPD undercover officer for approximately \$150.

d. On or about May 27, 2010, JUAN CAMACHO, a/k/a "Pito," a/k/a "Papito Camacho," the defendant, arranged a sale of approximately 11 bags of "crack" cocaine from ALEX AMANTE, the

defendant, to an NYPD undercover officer, in the vicinity of 621 Manida Street, Bronx, New York.

e. On or about May 27, 2010, in the vicinity of 621 Manida Street, Bronx, New York, RICKY BELL, the defendant, assisted in a sale of approximately 20 glassine bags of heroin from DENISE ALAMO, the defendant, to an NYPD undercover officer.

f. On or about June 1, 2010, NIVIA ALAMO, a/k/a "Nena," the defendant, arranged a sale of 11 bags of "crack" cocaine from RICKY BELL and ALEX AMANTE, the defendants, to an NYPD undercover officer, in the vicinity of 621 Manida Street, Bronx, New York, after which, JIMMY ALAMO, a/k/a "Skinny," and RICKY BELL, the defendants, acted as look-outs during a sale of approximately 20 glassine bags of heroin by a co-conspirator not named as a defendant herein to the undercover officer.

g. On or about July 1, 2010, in the vicinity of 621 Manida Street, Bronx, New York, GERALDO MARTINEZ, a/k/a "Macho," and RAYMOND LOPEZ, a/k/a "Ray," the defendants, sold approximately 11 bags of "crack" cocaine to an NYPD undercover officer for approximately \$90.

h. On or about July 7, 2010, in the vicinity of 621 Manida Street, Bronx, New York, OMAR GONZALEZ, a/k/a "O," the defendant, acted as a look-out during a sale of approximately 12 bags of "crack" cocaine from RAYMOND LOPEZ, a/k/a "Ray," the defendant, to an NYPD undercover officer.

i. On or about August 18, 2010, DENISE ALAMO, the defendant, arranged a sale of approximately 12 bags of "crack" cocaine from MANUEL ROSA, a/k/a "Manny," the defendant, to an NYPD undercover officer, in the vicinity of 621 Manida Street, Bronx, New York.

j. On or about September 23, 2010, DENISE ALAMO, the defendant, arranged a sale of "crack" cocaine from JOSE RODRIGUEZ, a/k/a "Joey," the defendant, to an NYPD undercover officer, in the vicinity of 621 Manida Street, Bronx, New York, and in the course thereof, LAWRENCE SIMMONS, a/k/a "Black," the defendant, instructed RODRIGUEZ, in substance, to sell "crack" to the undercover officer, and OMAR GONZALEZ, a/k/a "O," the defendant, told the undercover officer, in substance, that GONZALEZ would receive a reshipment of "crack" in about one hour.

k. On or about October 19, 2010, in the vicinity of 621 Manida Street, Bronx, New York, RAYMOND LOPEZ, a/k/a "Ray," the defendant, sold approximately 12 bags of "crack" cocaine to an NYPD undercover officer for approximately \$100.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense alleged in Count One of this Indictment, OMAR GONZALEZ, a/k/a "O," NELSON VELEZ, a/k/a "Nell," JUAN CAMACHO, a/k/a "Pito," a/k/a "Papito Camacho," GERALDO MARTINEZ, a/k/a "Macho," DENISE ALAMO, NIVIA ALAMO, a/k/a "Nena," JIMMY ALAMO, a/k/a "Skinny," RICKY BELL, RAYMOND LOPEZ, a/k/a "Ray," ALEX AMANTE, JOSE RODRIGUEZ, a/k/a "Joey," LAWRENCE SIMMONS, a/k/a "Black," and MANUEL ROSA, a/k/a "Manny," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment, including but not limited to, a sum in United States currency representing the amount of all proceeds obtained as a result of the offense alleged in Count One of this Indictment.

Substitute Asset Provision

6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;


c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;
or

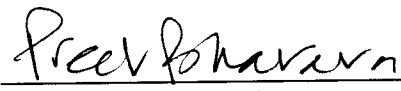
e. has been commingled with other property which cannot be subdivided without difficulty;


it is the intention of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)



FOREPERSON



PREET BHARARA 
United States Attorney

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OMAR GONZALEZ, a/k/a "O", NELSON VELEZ, a/k/a "Nell," JUAN CAMACHO,
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DENISE ALAMO, NIVIA ALAMO, JIMMY ALAMO, a/k/a "Skinny," RICKY BELL,
RAYMOND LOPEZ, a/k/a "Ray," ALEX AMANTE, JOSE RODRIGUEZ, a/k/a "Joey,"
LAWRENCE SIMMONS, a/k/a "Black," and MANUEL ROSA, a/k/a "Manny,"

Defendants.

INDICTMENT

10 Cr. ____ (____)

(21 U.S.C. § 846).

PREET BHARARA
United States Attorney.

A TRUE BILL

Foreperson,

11/3/10 Filed INDICTMENT

COTJ, USMJ